

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|  |   |                               |
|--|---|-------------------------------|
| Midwest Operating Engineers Welfare Fund,    | ) |                               |
| Midwest Operating Engineers Pension Trust    | ) |                               |
| Fund, Operating Engineers Local 150          | ) |                               |
| Apprenticeship Fund, Midwest Operating       | ) |                               |
| Engineers Retirement Enhancement Fund, Local | ) |                               |
| 150 IUOE Vacation Savings Plan and the       | ) |                               |
| Construction Industry Research and Service   | ) |                               |
| Trust Fund,                                  | ) |                               |
|  | ) |                               |
| Plaintiffs,                                  | ) | Civil Action No.: 19-cv-03394 |
|  | ) |                               |
| v.   | ) | Judge Edmond E. Chang         |
|  | ) |                               |
| WillCo Green LLC f/k/a E.F. Heil LLC,        | ) | Magistrate Judge Young B. Kim |
| SJZJ, LLC, and Donegal Services, LLC,        | ) |                               |
| joint employers,                             | ) |                               |
|  | ) |                               |
| Defendants,                                  | ) |                               |
|  | ) |                               |
| and  | ) |                               |
|  | ) |                               |
| E.F. Heil, LLC, f/k/a WillCo Green, LLC,     | ) |                               |
|  | ) |                               |
| Plaintiff/Counter-Defendant,                 | ) |                               |
|  | ) |                               |
| v.   | ) |                               |
|  | ) |                               |
| International Union of Operating Engineers,  | ) |                               |
| Local 150, AFL-CIO, District 1,              | ) |                               |
|  | ) |                               |
| Defendant/Counter-Plaintiff.                 | ) |                               |

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on **September 11, 2020 at 11:00 a.m.**, or as soon as counsel may be heard, I shall appear via Court-Solutions before the Honorable Magistrate Judge Young B. Kim or any judge sitting in his stead in Courtroom 1019 of the United States District Court for the Northern District of Illinois, Eastern Division, located at 219 S. Dearborn Street, Chicago, Illinois, and then there present **Motion to Extend Deadline for Completion of Fact Discovery**, a copy of which is hereby served upon you.

Respectfully submitted, SJZJ, LLC

By: /s/ Derek D. Samz

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**CERTIFICATE OF SERVICE**

The undersigned, a non-attorney, hereby certifies that on September 4, 2020, she served (or caused to be served) upon the persons listed below, via the Court's electronic CM/ECF system, copies of this **Notice of Motion**, and **Motion to Extend Deadline for Completion of Fact Discovery**.

/s/ Meagan E. Russell,  
Assistant to Derek D. Samz  
And Thomas J. Cassady

**SERVICE LIST:**

**Via CM/ECF**

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